

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

KAPLAN, et al.,

Plaintiffs,

Civil Action No.: 09-646 (RWR)

vs.

HEZBOLLAH, et al.,

Defendants.

DECLARATION OF PROFESSOR BARRY RUBIN

I, Barry Rubin, of Chevy Chase, Maryland, this 11th day of September, 2011, declare pursuant to 28 U.S.C. § 1746, as follows, subject to the penalties for perjury:

A. Professional Background

1. I am the director of the Global Research in International Affairs Center (“GLORIA”) at the, Interdisciplinary University (“IDC”), in Herzliya, Israel, as well as a member of the faculty. I am also a senior fellow at the IDC’s International Policy Institute for Counter-Terrorism. I hold a doctorate from Georgetown University, a master’s degree from Rutgers University, and a bachelor’s degree from Richmond College.

2. Throughout my academic career, I have held a number of professorships worldwide, including a position at the Hebrew University, Israel, 1994-1995; visiting professor,

Middle East Technical University, Ankara, Turkey (Summer 1995); and professor of Political Science, Bar-Ilan University, Israel (1995-1996). From 1994-2002, I was Deputy Director of the Begin-Sadat Center for Strategic Studies, Bar-Ilan University. More recently, I was the Seymour & Lillian Abensohn Visiting Professor in Israel Studies, The American University (2005-2006).

3. In addition to these positions, I have served as a visiting fellow at several academic and policy institutes, including a National Defense foreign language fellowship in Arabic (1977-78); a senior fellowship in Middle East Studies, Georgetown University Center for Strategic and International Studies (1978-1985); senior fellowship, Washington Institute for Near East Policy (1988-1991); senior fellowship and professorship, Foreign Policy Institute, Johns Hopkins University SAIS, (1986-1993); and a Fulbright fellowship, Haifa and Tel Aviv Universities (1990-1991).

4. I have been the recipient of numerous grants from a variety of institutions, including a grant from the U.S. Institute of Peace to study Arab-Israeli peace process (1989-1991); a research grant from the Harry Guggenheim Foundation to study PLO policy and terrorism (1990); a grant from the Leonard Davis Center, Hebrew University for research on U.S. Middle East policy (1993-1994); a grant from the Begin-Sadat Center at Bar-Ilan University for research on Israel's Middle East policy (1994-95); and three grants from Bradley Foundation, for a study of American allies (1998-1999), on armed forces of the Middle East (2000-2001), and on Anti-Americanism (2002-2003).

5. From 1985-1986, I served as the foreign policy adviser for United States Senator Gary Hart.

6. At present, I am the editor and publisher of the *Middle East Review of International Affairs*. I am also a member of the editorial board of the *Middle East Quarterly*. I

edit the Palgrave Macmillan's *Middle East in Focus* series and the Taylor & Francis Middle East military/strategic series. I am a syndicated Middle East columnist for the *Jerusalem Post*.

7. I have written and edited many books and articles on the topics of international relations, Middle East, Palestinian politics, and global terrorism. Specifically, I have authored the followings works on Palestinian history and terrorism: *The Arab States and the Palestine Conflict*, Syracuse University Press (1981); *Cauldron of Turmoil: America in the Middle East*, Harcourt, Brace, Jovanovich (1992); *Revolution Until Victory?: The Politics and History of the PLO*, Harvard University Press (1994); *The Transformation of Palestinian Politics*, Harvard University Press (1999); *The Tragedy of the Middle East*, Cambridge University Press (2002); and *Yasir Arafat: A Political Biography*, Oxford University Press (2003). I have also authored political studies of totalitarian regimes, including *Modern Dictators: Third World Coupmakers, Strongmen, and Populist Tyrants*, McGraw-Hill (1987); and *The Truth About Syria*, Palgrave-MacMillan (2007).

8. Throughout my academic career, I have published hundreds of articles and monographs on international relations and terrorism. I have written extensively on the subject of Palestinians and the PLO: "Egypt and the Palestine Question, 1922-1939," in *Essays on Israel and Palestine* (Wiener Library, 1978); *The PLO's Intractable Foreign Policy*, Washington Institute for Near East Policy, 1986; *The PLO – A Declaration of Independence?*, Washington Institute for Near East Policy, Policy Focus No. 8, November 1988; *Inside the PLO: Officials, Notables, and Revolutionaries*, Washington Institute for Near East Policy, Focus No. 12, December 1989; *The PLO's New Policy: Evolution Until Victory?* Washington Institute for Near East Policy, Policy Paper #13 (June 1989); "The Origins of PLO Terrorism," in Barry Rubin, *Terrorism and Politics*, St. Martin's Press (1991); "The PLO After the Gulf Crisis," in

Robb Satloff, *The Politics of Change in the Middle East*, Westview (1993); *The PLO Between Anti-Zionism and Antisemitism*, Hebrew University Sassoon Center (1993); “The United States and Iraq” and “The PLO and Iraq” in Amatzia Baram and Barry Rubin, *Iraq’s Road to War*, St. Martins (1994); *The Palestinian Charter: Prospects for Change and Options for Israel*, BESA Center (1996); “Misperceptions and Perfect Understanding: The US and the PLO,” in Avram Sela and Moshe Ma’oz, *The PLO and Israel, From Armed Struggle to Political Settlement*, St. Martins Press, (1997); “Israel, The Palestinian Authority, And the Arab States,” *MERIA Journal*, Vol. 1 No. 4 (December 1997); “After Arafat: Succession and Stability in Palestinian Politics,” *Middle East Review of International Affairs*, Vol. 2 No. 1 (March 1998); *Israel, The Palestinians, and The Arab States*, BESA Center (1998); “The Future of Palestinian Politics: Factions, Frictions, and Functions,” *Middle East Review of International Affairs*, Vol. 4, No. 3 (September 2000); “The Palestinian Movement: From Catastrophe to Disaster,” in Robert O. Freedman *The Middle East Enters the 21st Century*, University of Florida Press, (2002); “Geopolitique du territoire controversé et d’un éventuel Etat Palestinien,” in *Frontières Palestiniennes Regards Croisés des Géographes*, Geographes Associés (2004); “The Decline and fall of the Palestinian nationalist movement,” in Barry Rubin, *Political Islam*, Vol. II, Routledge (2007); and “Israel and the Palestinians,” in Robert O. Freedman, *Contemporary Israel*, Westview Press (2008).

9. On the topic of North Korea and its connection to the Middle East, I wrote *North Korea’s Threat to the Middle East and the Middle East’s Threat to Asia*, Begin-Sadat Center (1997). I have also written on US-North Korean relations in “Lessons from Iran” in Alexander T. J. Lennon and Camille Eiss, *Reshaping Rogue States: Preemption, Regime Change, and U.S. Policy toward Iran, Iraq, and North Korea*, MIT Press (2004).

10. I have served as an expert witness on contemporary Middle Eastern history in the cases of *Saperstein, et al v. Palestinian Authority, et al* (1:04-cv-20225-PAS), *Bigio et. al v. The Coca Cola Company*, 97-cv-2858-BSJ, and *Calderon v. Democratic People's Republic of Korea et. al*, (08- cv-1367-FAB).

11. A copy of my resume is attached hereto as Exhibit A.

B. Nature of This Expert Witness Report

12. I have been asked by counsel for the plaintiffs in the case of *Kaplan et al v. Hezbollah and the Democratic Peoples' Republic of Korea, et al.* to provide my professional opinion as to whether the Democratic Peoples' Republic of Korea ("DPRK") provided material aid and support, training and weapons to the Hezbollah terrorist organization in the period prior to and during the Second Lebanon War of 2006.

13. My opinion as set forth below is based upon my academic studies, research, teaching and publishing over the course of many years as director of an international relations institute, senior fellow at a counter-terrorism institute, and lecturer at numerous academic institutions. During the course of my professional career and academic research, I have obtained information from interviews with political leaders and captured terrorists, reviews of documents, periodicals, credible news reports, discussions with reliable journalists, government publications, and scholarly works, as well as from my own observations and experiences living in the Middle East.

14. Moreover, in preparing this opinion, I have examined the complaint filed by the plaintiffs against the defendants.

C. Historical Context

15. The 2006 Lebanon War witnessed the large scale firing of rockets and missiles by Hezbollah on areas of civilian population in northern Israel. In the period prior to the war, Hezbollah amassed a large arsenal of long, medium and short-range missiles. In achieving this capability, Hezbollah was aided by its main regional allies, Iran and Syria. North Korea, which has maintains a close strategic relationship with both these countries, also played an important role in arming Hezbollah.

16. In addition to amassing a large missile arsenal, Hezbollah also developed an extensive tunnel network close to the border with Israel. Evidence has emerged suggesting that North Korea played a central role in the construction of this tunnel network.

17. North Korea was and is a communist regime but it is also one marked with special characteristics. The three key points which have historically characterized and differentiated its behavior in the Middle East were its extremist militancy (compared to the USSR and China); its recklessness, systematically taking high levels of risk; and its desire to carve out an independent role for itself in promoting revolution and developing clients in the Middle East.

18. More broadly, North Korea sought to discredit the United States, show it to be unable to protect allies, and to destroy countries friendly to America. Israel fell into that category both as a direct target and as a symbolic target.

19. The ability to strike against Israel would, North Korean policymakers believe, greatly increase their regime's popularity and attractiveness as an ally within the Arab world. In the 1970's, North Korea thus offered active support to terrorist organizations fighting Israel.

20. Today, the communist ideology is largely discredited, and has little appeal in the Middle East. North Korea is isolated and has suffered economic difficulties both because of US sanctions and because of economic mis-management. North Korea's extreme anti-western stance remains, and it has a pressing need for hard cash. These factors combine to produce a policy in the Middle East of seeking alliance with anti-western regimes and movements, in order to provide them with technological and material support, in return for money. The key anti-western and anti-Israeli alliance in the Middle East today is the bloc led by the Islamic Republic of Iran and including Hezbollah and Syria. North Korea's anti-western outlook, its international isolation and its urgent need for hard currency underlie Pyongyang's active support for Iran, Syria and Hezbollah.

21. North Korea maintains a strategic alliance with Iran. Iran's allies, including Hezbollah, benefit from this alliance. This alliance developed during the Iran-Iraq War (1980-1988). North Korea is an isolated, tyrannical state, in need of hard currency. Mercenary and criminal activities and the selling of weaponry constitute significant sources of income for the regime of Kim Jong-Il. In earlier periods, North Korean support for terrorist organizations had an ideological element, based on shared communist loyalties. Pyongyang stood out from other communist regimes because of its extremist militancy (compared to the USSR and China); its recklessness, systematically taking high levels of risk; and its desire to carve out an independent role for itself in promoting revolution and developing clients in the Middle East.

22. The ideological aspect does not pertain with regard to relations between North Korea and Iran and its regional clients. Rather, the North Korean interest is in financial gain. But the methods developed, involving defiance of international law and norms of state behavior, and support for terrorist activities, have remained the same.

23. Hezbollah benefits from the alliance between North Korea and Iran. Iran is prepared to finance North Korean provision of assistance to Hezbollah in areas where North Korea possesses expertise and weaponry which Iran does not. Specifically, Hezbollah has benefited from North Korean expertise in tunnel construction, reverse engineering and provision of weaponry.

D. Hezbollah and the Second Lebanon War

24. Hezbollah is a Shia Lebanese paramilitary and political organization, currently headed by Sayed Hassan Nasrallah. The group evolved from the coming together in Baalbeck (Bekaa Valley region of Lebanon) in 1982 of a number of different Shia Islamist factions. Most important of these was the Islamic Amal (*Amal al-Islamiyyah*) group led by Hussein Mussawi, and the followers of Sheikh Subhi Tufayli, in the *al-Dawah* group. These two groupings, along with a number of smaller factions, cooperated with representatives of the *Qods* Force of the Iranian Revolutionary Guard present in Baalbeck from July 1982, and under *Qods* Force tutelage, the groups were brought together to form a single, pro-Iranian, Shia Islamist group. This group was named Hezbollah (Party of God). Its stated goal was to fight against the then Israeli military control of South Lebanon by armed force.

25. Hezbollah from the outset engaged in acts of terror against Israeli and U.S. targets. Most notoriously, the organization carried out a suicide bombing of the U.S. Marines barracks in Beirut, on October 23, 1983. Two hundred forty one American servicemen died in this attack. Fifty eight French paratroopers were killed in a separate attack by the organization on the same day. Equipped and trained by Iran, Hezbollah grew to be one of the most powerful terrorist organizations in the world.

26. In the period 1990-2000, Hezbollah became the main organization engaged in fighting Israel in the latter's self-declared 'security zone' along the border between Israel and Lebanon. With Israel's withdrawal from this area in May, 2000, the movement considered itself to have won a major victory. In the 2000-2006 period, Hezbollah took exclusive control of the Lebanese side of the border, and began to build up its arsenal of short, medium and long-range missiles in the area between the Litani River and the border.

27. The Second Lebanon War broke out as a result of a Hezbollah attack across the border into Israel. The border towns of Zarit and Shlomi were subjected to rocket fire, as a diversion for an attack through the border fence on an army jeep patrol near Zarit. Five civilians were wounded in the rocket fire. Three soldiers were killed, and two captured. The Israel Defense Forces responded with artillery and airstrikes.

28. Israel targeted Hezbollah's stockpiles of long and medium range missiles, destroying most of these in the first days of the war. Hezbollah's short range missile capacity, however, was largely invulnerable to Israeli air attacks. As a result, the organization kept up a steady stream of rocket attacks on Israel's northern communities throughout the war. Hezbollah fired between 3,970 and 4,228 rockets, at a rate of more than 100 per day. The great majority of these rockets were of the 122 mm Katyusha type (around 95 percent), carrying warheads of up to 30kg and with a range of up to 30 km (19 miles). Around 23 percent of these hit cities and built up areas of northern Israel. The remainder landed in open areas. The attempts by the Israeli Air Force to strike at Hezbollah's short range rocket launchers were severely impeded by the North Korean-built system of bunkers and tunnels used by Hezbollah in south Lebanon during the 2006 war. The tunnel system enabled Hezbollah to fire and then swiftly conceal its rocket-launching equipment.

29. Forty three Israeli civilians were killed as a result of Hezbollah rocket fire in the course of the war of 2006, and 4,262 civilians were injured. The death toll was prevented from being higher because of the availability of warning systems and bomb shelters in northern Israel. The short-range rockets fired by Hezbollah had only a primitive targeting mechanism. Thus, the launching of the rockets consisted of a form of deliberate attack on the civilian population. Although these rockets hold only a relatively small warhead, the example of the 2006 war shows that they can inflict both severe disruption and loss of life to civilian populations.

30. In addition to the launching of rockets, Hezbollah engaged in ground clashes with the Israel Defense Forces, operating from within a sophisticated structure of fortified positions and tunnels. Hezbollah's intention, in ground engagements with the IDF, was to inflict the maximum number of casualties. This was in line with the movement's belief that Israel was not capable of absorbing large numbers of dead and wounded. Hezbollah was only partially successful in this, though. While the movement did succeed in inflicting losses on the IDF, Hezbollah fighters suffered higher casualty rates, and failed to force a change on Israeli policy through attrition.

31. Since the 2006 war, Hezbollah has largely rebuilt its infrastructure and replaced its losses. The movement now possesses a considerably larger arsenal than it held immediately prior to the 2006 war. Hezbollah has also accumulated considerable political power, and is now the central element in the Lebanese government.

E. The Hezbollah-North Korea Connection

32. As Iran's most important regional terrorist client, Hezbollah benefits from the close connection between Teheran and Pyongyang described above. North Korean aid to

Hezbollah takes three forms: provision of weapons, provision of training, and assistance in building infrastructure.

33. The evidence shows that North Korea was providing weaponry to Hezbollah prior to the 2006 war, and it continues to do so today. According to a report on the Hezbollah-North Korea relationship published in the South Korean Jong Ang Ilbo newspaper, Israeli intelligence reports confirm that ‘vital missile components’ of missiles fired at Israel during the 2006 war came from North Korea. By 2006, Syria was receiving nearly a quarter of its military hardware from North Korea. A portion of this was transferred on to Hezbollah.

34. With regard to provision of weapons: over the last two years, a number of North Korean arms shipments to Iran have been intercepted. Three vessels were intercepted in 2009, carrying what Israeli and western intelligence officials believe to have been weapons bound for Hezbollah and Hamas, another designated terrorist organization. The largest shipment was apprehended on a ship that was searched in Dubai before being scheduled to leave for Iran in July, 2009. All three ships were found to contain North Korean components for 122mm Grad (Katyusha) rockets and rocket launchers. The shipment apprehended in Dubai included 2,030 detonators for the rockets, and related electric circuits and solid fuel propellant for rockets. These rockets, as noted above, were the main weapons used by Hezbollah in targeting the civilian population of northern Israel during the war of 2006.

35. In December, 2009, a shipment of 35 tons of North Korean weapons was apprehended on an Ilushin T76 transport aircraft which had flown from Pyongyang to Bangkok—where the weapons were seized. The flight plan of the aircraft indicated that its final destination was Iran. The weapons seized included two M-1958 multiple 240 mm rocket launchers, rocket launching tubes, 24 240 mm rockets, shoulder-launched missiles, and components of surface to

air missiles. Intelligence sources were quoted as saying that they considered these weapons to be probably bound for Hezbollah. Weapons experts noted that the type of rockets found in the shipments were of the type often used by Hezbollah against Israel.

36. The weapons intercepted on these occasions offered hard evidence to support claims that North Korea has been supplying Hezbollah with weaponry, as an aspect of Pyongyang's larger strategic relationship with Iran. Additional evidence indicates that direct North Korean military aid to Hezbollah is not limited to the lower caliber items in the movement's armory. A recent report noted that Iran and North Korea are together engaged in the production of the M-600 rockets which give Hezbollah the ability to strike at urban centers in central Israel. These weapons are considered to be among the most strategically important in Hezbollah's arsenal.

37. North Korea has developed some skill in reverse engineering and producing foreign military hardware. These skills have also been employed in aiding Hezbollah. According to recent reports, North Korea's Mining Development Trading Corporation ("KOMID") cooperated with Syria's Scientific Study Research Center to reverse-engineer and then produce the Russian made Kornet anti-tank missiles which were used to telling effect by Hezbollah against Israeli armor during the 2006 war. The main manufacturing facility for this practice is the Kanggye General Tractor Plant no. 26 in the Jagang province of North Korea. KOMID was superseded in 2009 by Green Pine Associated corporation as the main body engaged in the illegal arms trade on behalf of North Korea.

38. In addition, North Korea is a full participating partner in the process whereby Iran seeks to evade sanctions and acquire arms for itself and proxy organizations such as Hezbollah. The Iranian Revolutionary Guards use a variety of shell companies, multiple purchases, and

other means both to bypass sanctions and to ensure that weaponry reaches its clients. A North Korean defector outlined to a South Korean newspaper a system whereby personnel from the Korean Peoples' Army (the North Korean army) engage in disguising arms shipments. According to the defector, containers are moved across the Yalu River from North Korea into China, a third or a half full of weapons. They are then shipped to a third country and the containers are filled up with unrelated freight. The containers are then mixed with additional innocuous freight in ports known to be lax in inspection for illegal arms interdiction. Shipment to the Middle East then takes place.

39. The role of Syria as a conduit for arms supplies from North Korea to Hezbollah should be noted. Under Bashar Assad, Syria has built a close strategic relationship with Pyongyang. Just under a quarter of Syrian military hardware comes from North Korea. Iran finances many of these purchases. Some of this weaponry is purchased by Syria and later shipped across the border into Lebanon to Hezbollah.¹ (A copy of an article by Carl Anthony Wege is attached hereto as Exhibit B).

40. Regarding provision of training by North Korea to Hezbollah, movement cadre began to travel to North Korea for specialist instruction as early as the late 1980's. According to the respected Intelligence Online² publication (copies of the articles appearing in Intelligence Online are attached hereto as Exhibits C and D), current Hezbollah General-Secretary Hassan Nasrallah visited North Korea for training purposes in the late 1980's. Among other noted movement personnel thought to have undergone training in North Korea is Mustafa Badreddine,

¹ Carl Anthony Wege, "The Hizballah-North Korea Nexus," Small Wars Journal, January 23, 2011.

² "Hezbollah Training in North Korea," Intelligence Online, April 20, 2007. URL: www.intelligenceonline.com.

who served as the movement's counter-espionage chief in the 2006 war. Badreddine, the brother in law of Hezbollah's terrorist and paramilitary mastermind Imad Mughniyeh, recently had a warrant for his arrest issued because of his suspected involvement in the murder of former Lebanese Prime Minister Rafiq al-Hariri in 2005. Ibrahim Akil, head of Hezbollah's security and intelligence service, has also received training in North Korea. As the names on this list indicate, training in North Korea appears to be offered only to senior and specialist cadres, presumably because of its cost for the movement or for Iran. The training of regular Hezbollah fighters takes place in Iran, in Syria and in Lebanon itself.

41. North Korean involvement in the training of Hezbollah fighters has increased in the period following the 2006 war. Iran acts as the middleman and facilitator in this process. The Revolutionary Guards in 2007 negotiated an agreement with Pyongyang for 100 Hezbollah field operatives to travel to North Korea to undergo training with the North Korean special forces, as well as counter espionage and intelligence training. This agreement was announced to Hezbollah leader Hassan Nasrallah during a trip to Iran that he made in April, 2007, accompanied by Iranian ambassador to Syria Hasan Akhtari.

42. In the 1990's, the greater part of training given to Hezbollah personnel is thought to have been carried out by the VIII Special Corps of the Korean Peoples' Army. Trainees were kept segregated in the Chol Bongri district while the training was carried out.

43. On the issue of North Korean support for Hezbollah efforts in building infrastructure, most significant in this regard is the assistance given the movement in the building of the extensive and sophisticated tunnel network in the area south of the Litani River and bordering Israel. This structure proved invaluable to the movement in the course of the 2006 war.

44. The army of North Korea excels in the building of tunnels and underground bunker systems. The army maintains a unit, called Unit 583, which answers to the chief of staff and whose task is to maintain and supervise the 20 infiltration tunnels situated along the border with South Korea.³ (A copy of an article from Intelligence Online is attached hereto as Exhibit E). In addition, the North Korean Ministry for Public Security and the intelligence service maintain a Bureau of Engineers whose task is the construction of bunkers for the country's leaders and the building of underground infrastructure for the country's nuclear program.

45. After 2000, Pyongyang began to send trainers to south Lebanon to instruct Hezbollah cadre in the construction of tunnels and underground bunkers. According to a Japanese news report, in 2004 Syrian President Bashar Assad met with North Korean officials in Damascus and asked for North Korean assistance in designing and constructing an extensive system of tunnels for Hezbollah in south Lebanon. This system was built under North Korean auspices. It greatly assisted Hezbollah in its efforts against Israeli troops in the 2006 war.

46. The tunnel and bunker system enabled Hezbollah to locate many of its 1,000-1,500 rocket launchers underground when not in use, thus preventing Israeli aerial surveillance from locating them. As noted above, these rocket launchers were used to fire on the civilian population of northern Israel.

47. One report described a North Korea-assisted facility in south Lebanon as consisting of a sophisticated, 25 kilometer underground tunnel including numerous assembly points which enabled Hezbollah to concentrate and move forces.⁴ When Israeli ground forces

³ "Going Underground: Iran/North Korea," Intelligence Online, February 25, 2010. URL: www.intelligenceonline.com

⁴ Mark E. Manyin, "North Korea: Back on the Terrorism List?" Congressional Research Service, June 29, 2010. URL: <http://www.fas.org/sgp/crs/row/RL30613.pdf>

entered southern Lebanon, the tunnels enabled Hezbollah to move from location to location and attack the forces in the rear. Some of the tunnels also contained large storage rooms.

48. Lenny Ben-David, a former Israeli diplomat, has specified that North Korean experts were brought into Lebanon by the Korea Mining Development Corporation.⁵ (An article by the former diplomat is attached hereto as Exhibit F). The configuration and parameters of the tunnel system closely resemble the layout of similar systems in the demilitarized zone separating North and South Korea.

49. In the period following the 2006 war, Hezbollah is thought to have developed a more extensive tunnel and bunker system, expanding it into the northern Beka'a Valley. Upwards of 600 ammunition and weapons bunkers were constructed south of the Litani River. In the pre-2006 period, the construction of this system included many successful deception operations, involving Hezbollah personnel, officers of the Iranian Revolutionary Guard and North Korean advisers. The North Koreans were also assisted in their task by Iranian engineers.

50. A defector from the Iranian Revolutionary Guards, Ali Nurah Zada, described additional details of the tunnel network, noting that some of the border bunkers, particularly the command bunkers, were located 40 meters below the earth's surface. Elements of the system were lined with painted steel plates and power cables. Parts of the system had mobile floors, with each element having four openings enabling the free movement of fighters. One such network covered roughly two square kilometers. Rocket firing positions too were well concealed and protected. One example showed a pair of firing pits at a depth of roughly five meters, with thick concrete frames reinforced with blast walls and covered with sandbags. These pits would allow rockets to be fired with minimal heat signatures, thus again helping to prevent their detection by

⁵ Lenny Ben-David, "Mining for Trouble," Jerusalem Post, October 29, 2007.

Israel. Again, it should be stressed that these rockets were being used to target a civilian population. The expertise provided by North Korea in the area of tunnel and bunker construction thus directly facilitated the process in which Hezbollah sought to terrorize the Israeli civilian population.

F. Conclusion

51. As a close ally of Iran, and as a country possessing technological capabilities in certain areas superior to those available to any other ally of Iran, North Korea played a vital role in aiding and facilitating the military efforts of Iran and its regional allies in the period leading up to the Israel-Hezbollah War of 2006.

52. Hezbollah, a Shia Lebanese Islamist organization established in 1982, is a central regional client of Iran, which was established under Iranian auspices. Iran maintains the organization financially and through training and the provision of arms. The Iranian alliance with North Korea has meant that North Korea has also offered extensive assistance to Hezbollah.

53. North Korean assistance to Hezbollah prior to the Israel-Hezbollah War of 2006, and continuing today, is extensive and has taken place in three areas: the supplying of arms, the provision of training, and assistance in building specialized infrastructure—deriving from North Korea's very high abilities in the field of constructing underground tunnel and bunker systems. North Korea has been responsible for the provision or construction of weapons systems received

by Hezbollah which were later used in attacks on Israeli civilians during the Israel-Hezbollah war of 2006. Senior Hezbollah cadre – including very prominent movement figures – have undergone training in North Korea. North Korea was involved in the construction of the extensive tunnel and bunker network in southern Lebanon discovered by Israeli forces in the course of the 2006 war. This network, apart from offering shelter and mobility to fighters seeking to engage with Israeli forces, also made possible the concealment of rocket launchers engaged in attacks on civilians, and in preventing their detection. This enabled the attacks on civilians to continue.

55. North Korea is a close and vital ally of Hezbollah, a designated terror organization engaged in attacks on civilians. North Korea provision of material support and resources has significantly increased Hezbollah's capabilities over the last two decades and assisted the terrorist group in the destruction it inflicted upon Israel's civilian population during the Israel-Hezbollah War in 2006.

I declare, under penalty of perjury, that the foregoing is true and correct.

Executed on the of September, 2011.


Barry Rubin